



Notice of Service of Process

KSB / ALL
Transmittal Number: 24887255
Date Processed: 05/09/2022

Primary Contact: Venessa C. Wickline Gribble
The Kroger Co.
1014 Vine Street
Cincinnati, OH 45202-1100

Entity:	The Kroger Co. Entity ID Number 2171751
Entity Served:	The Kroger Company AKA Kroger Limited Partnership D/B/A Kroger Store Number K029
Title of Action:	Karen Pannell vs. The Kroger Company AKA Kroger Limited Partnership D/B/A Kroger Store Number K029
Matter Name/ID:	Karen Pannell vs. The Kroger Company AKA Kroger Limited Partnership D/B/A Kroger Store Number K029 (12266597)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Sullivan County Circuit Court, TN
Case/Reference No:	C43831 (C)
Jurisdiction Served:	Tennessee
Date Served on CSC:	05/05/2022
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	George Todd East Attorney at Law 423-246-3278

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

Sullivan County	STATE OF TENNESSEE CIVIL SUMMONS page 1 of 1	Case Number C43831 (c)
Karen Pannell	Vs.	The Kroger Company aka Kroger Limited Partnership d/b/a Kroger Store Number K029

Served On:

The Kroger Company aka Kroger Limited Partnership d/b/a Kroger Store Number K029 via Registered Agent: Corporation Service Company at 2908 Poston Ave, Nashville, TN 37203

You are hereby summoned to defend a civil action filed against you in Kingsport-Circuit Court, Sullivan County, Tennessee. Your defense must be made within thirty (30) days from the date this summons is served upon you. You are directed to file your defense with the clerk of the court and send a copy to the plaintiff's attorney at the address listed below. If you fail to defend this action by the below date, judgment by default may be rendered against you for the relief sought in the complaint.

Issued: April 22, 2022

Clerk / Deputy Clerk

Attorney for Plaintiff: G. Todd East 423-246-3278
121 W Market St Kingsport, TN 37660

FILED
4/22/22 1:39 pm
Bobby L. Russell
CIRCUIT COURT CLERK
KINGSPORT, TN

NOTICE OF PERSONAL PROPERTY EXEMPTION

TO THE DEFENDANT(S): Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption as well as a homestead exemption from execution or seizure to satisfy a judgment. The amount of the homestead exemption depends upon your age and the other factors which are listed in TCA § 26-2-301. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the clerk of the court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for your self and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer. Please state file number on list.

Mail list to _____, _____ Clerk, _____ County

CERTIFICATION (IF APPLICABLE)

I, _____ Clerk of _____ County do certify this to be a true and correct copy of the original summons issued in this case.

Date: _____

Clerk / Deputy Clerk

I HEREBY CERTIFY THIS

OFFICER'S RETURN: Please execute this summons and make your return within ninety (90) days of issuance as provided by law.

I certify that I have served this summons together with the complaint as follows: _____

Date: _____

By: _____
Officer, Title

Bobby L. Russell
CIRCUIT COURT CLERK

RETURN ON SERVICE OF SUMMONS BY MAIL: I hereby certify and return that on _____, I sent postage

prepaid, by registered return receipt mail or certified return receipt mail, a certified copy of the summons and a copy of the complaint in the above styled case, to the defendant _____. On _____ I received the return receipt, which had been signed by _____ on _____. The return receipt is attached to this original summons to be filed by the Court Clerk.

Date: _____

Notary Public / Deputy Clerk (Comm. Expires _____)

Signature of Plaintiff

Plaintiff's Attorney (or Person Authorized to Serve Process)
(Attach return receipt on back)

ADA: If you need assistance or accommodations because of a disability, please call _____, ADA Coordinator, at () _____

FILED

4522139 (am pm)
Bobby L. Russell DC
CIRCUIT COURT CLERK
SULLIVAN COUNTY, TN.

CIRCUIT COURT CLERK
SULLIVAN COUNTY, TN.

CIVIL ACTION NO. CL43831(C)

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with vision. Further, Plaintiff Karen Pannell continues to have pain due to her injuries, and she has suffered great pain and mental anguish, and will continue to do so as a result of the aforementioned injuries.

5. Defendant and their employees are under a duty to Plaintiff Karen Pannell to exercise reasonable care for her protection while she is on Defendant's property. Defendant and their employees knew or by exercise of required or reasonable care should expect customers to bend over while collecting items to purchase from the lower level shelves. While bent over, Plaintiff is defenseless from avoiding carts operated by Defendant's employees. Defendant negligently breached these duties of care owed to Plaintiff Karen Pannell, thereby proximately causing her to suffer the injuries and damages alleged herein.

6. That the injuries sustained by Plaintiff Karen Pannell have been severe, painful, incapacitating and disabling. That in addition to the painful, disabling and physically incapacitating nature and extent of her injuries, Plaintiff Karen Pannell has suffered severe emotional and mental trauma, pain and distress due to the severe nature and extent of her injuries. That the Plaintiff has been denied her right to a full enjoyment of her future lives by virtue of the permanent, disabling and incapacitating nature and extent of Plaintiff Karen Pannell's injuries.

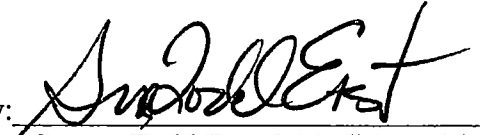
7. That Plaintiff Karen Pannell has incurred hospital, doctor and related medical expenses in the amount of \$_____ for the reasonable and necessary medical treatment of her injuries and may incur hospital, doctor, nursing, and related medical expenses in the future due to the severe and permanent nature of her injuries.

8. That Defendant is at fault for failing to use ordinary or reasonable care which proximately caused the injuries and damages sustained by Plaintiff.


WHEREFORE, Plaintiff demands the following:

1. That proper process issue and be served upon the Defendant and that the Defendant be required to appear and answer the Complaint within the time required by law.
2. That Plaintiff Karen Pannell be awarded judgment against the Defendant for compensatory damages in the amount of ONE HUNDRED THOUSAND (\$100,000.00) dollars.
3. That the costs of this action be awarded to the Plaintiff.
4. That a jury try this cause.
5. For such further and other general relief to which Plaintiff may be entitled.

KAREN PANNELL

By: 
George Todd East (BPR # 012062)
Attorney for Plaintiff
121 West Market Street
Kingsport, TN 37660
(423) 246-3278

HEREBY CERTIFY THIS
IS A TRUE AND CORRECT
COPY OF THE ORIGINAL
FILED IN THIS CAUSE


Bobby L. Russell
CIRCUIT COURT CLERK

COST BOND

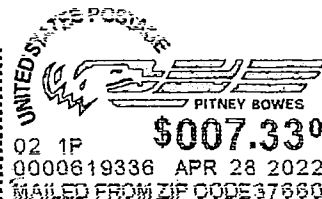
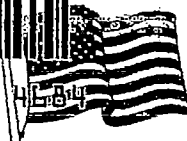
I hereby acknowledge myself surety for the costs of this cause not to exceed \$500.00.


GEORGE TODD EAST, ESQUIRE

George Todd East
Attorney at Law
121 West Market Street
Kingsport, TN 37660



7019 2970 0001 6006 4584



The Kroger Company aka Kroger Limited Partnership
d/b/a Kroger Store Number K029
via Registered Agent: Corporation Service Company
2908 Poston Ave, Nashville, TN 37203

